# Site Evaluation

*A Guide for Pesticide Secondary Containment*

This guidance discusses the importance of conducting site evaluations in order to determine the suitability of a site for ***new containment facility*** construction. If there is contamination from previous site activities it would be easier and less costly to clean up the site *before* a new facility is built over the contamination. Knowledge of site conditions gained from the evaluation may help with business issues involving; insurability, real estate transactions, bank loans, and other concerns.

## WHAT IS A SITE EVALUATION?

A site evaluation is a preliminary study to provide baseline information about site conditions and the suitability of building on a particular site. The main objectives of the evaluation are to: 1) Confirm or rule out contamination and determine level and extent of any existing contamination; 2) Identify the hazardous substances that contaminated the site; 3) Identify environmental characteristics associated with the site; 4) Evaluate the potential threat to human health and the environment for both existing contamination and from future use of the site.

### What Makes Up A Site Evaluation

In order to determine the possibility of contamination, a site evaluation should involve the following elements: 1) A comprehensive review of historical records; 2) Interviews with people familiar with the property; 3) A site inspection; 4) Possible sampling to test for contamination.

### Interviews of People

Interviews or questionnaires can provide useful information about a site. The following individuals could be interviewed depending on the circumstances:

- Present and former owners, operators, and employees of a facility.
- Regulatory agency personnel who may have worked with the property.
- Neighboring residences or businesses.

The following are examples of some of the questions you could ask during this process:

- ✓ What are the past uses of the property?
- ✓ What chemicals have been used, manufactured, treated, stored, disposed of, or released on the site?
- ✓ Has any hazardous waste or other waste materials been treated, stored, or disposed of at the site?
- ✓ Are there any underground storage tanks, dry wells, drain fields, or other buried structures where chemicals have been stored or disposed of?
- ✓ What is the compliance record with environmental laws for past facilities at the site?

*Hazardous Waste and* ReduceWaste *Toxics Reduction Program*

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## Review of Records

Regulatory agencies such as EPA, the Department of Ecology, county health departments, and local planning offices may have useful information about a site. The following types of information are often available for review at federal, state, and local regulatory agencies.

Environmental permits (air, water, discharge, septic, etc.).

Hazardous waste manifests, storage notices, and waste generator reports.

Inspection reports.

Spill Reports.

Violation notices, administrative orders, compliance schedules, or other enforcement actions regarding the site.

Zoning, comprehensive plans, and business licenses.

*Copies can be obtained, sometimes for a fee, by contacting the appropriate agency.*

Other valuable sources of public records include local newspapers, the county auditors office, and the district and superior courts. The following types of information may help determine the nature of prior site activities and possible contamination problems.

- ✓ Title records.
- ✓ Existing environmental liens.
- ✓ Surrounding property owners.
- ✓ Aerial photographs.
- ✓ Polk directories and Sanborn Fire Insurance Maps.
- ✓ Litigation regarding property or owners.

## Site Inspection

All site evaluations should include an on-site inspection of the property. Many indications of environmental problems can be easily identified by walking around and visually inspecting the property. Warning signs often include:

- ✓ Lack of vegetation, sick or dead vegetation.
- ✓ Unusual or noxious odors.
- ✓ Stained soil.
- ✓ Settling ponds or unnaturally colored surface water.
- ✓ The presence of fill consisting of waste materials.
- ✓ Containers or drums of unknown contents.
- ✓ Proximity of property to known or suspected hazardous waste sites.
- ✓ Condition of existing pollution control equipment.

If contamination is found, then samples of the soil at and around the site should be taken. Surface and groundwater samples should also be taken both at and downstream from the site. This will help determine the extent, level and movement of contamination.

Consider the physical characteristics of the site. This can provide clues to the possible existence of contamination as well as indicate the suitability of continued site use. Proper inspection before construction begins can reduce potential liability in the future.

Make a sketch of the site. The sketch should show; the location and description of facilities, existing drainage patterns and topography, depth to groundwater and groundwater flow, prevailing winds, soil type, and proximity to wells or water supply as well as any particularly sensitive areas of the property needing special consideration. An appropriate scale should be indicated on the sketch.

Due to the unique history and circumstances surrounding every piece of property, the scope of a site evaluation should be determined on a site-by-site basis. However, keep in mind, the more likely a site is contaminated, the more detailed the site evaluation should be.

Although this section provides some of the basics of a site evaluation, this information should not be used to replace the advice and technical assistance of legal or technical specialists who have reliable experience with site evaluations.

## WHY CONDUCT A SITE EVALUATION?

You can benefit in many ways from conducting a site evaluation on your property. Information acquired during the site evaluation can document the condition of the land during your ownership and be of value to you in the future. Insurance may be easier to obtain. Banks may be more willing to loan money when documentation is available about the condition of the land. Good documentation can help expedite the loan process. Finally, when you can establish that the property is not contaminated during the period of your ownership, you can limit any potential future liability that could emerge if someone else contaminates the property at a later date.

In 1988 the Model Toxics Control Act was passed by voters in Washington State. This law requires the identification, investigation, and cleanup of sites that are contaminated with hazardous substances. Liability under this law is far reaching and can be costly. You do not have to be responsible for all the contamination on your property to be required to pay the cost of cleaning it up. Building a new secondary containment facility upon a previously contaminated site could result in significant costs, if removal of the facility is necessary to conduct a cleanup. Reconstruction of the facility at the existing site, or relocation to a new site would involve additional costs as well. These costs could be avoided if proper steps are taken, before construction, to determine whether contamination exists.

## WHAT TO DO IF CONTAMINATION IS DISCOVERED

The Department of Ecology requires owners and operators to provide information on sites where a release of a hazardous substance has been discovered due to *past* practices. If a site evaluation indicates that contamination may be present that could threaten human health or the environment, this must be reported to Ecology. Reporting requirements are a provision of The Model Toxics Control Act Cleanup Rules – Chapter 173-340-300 WAC.

## Publications

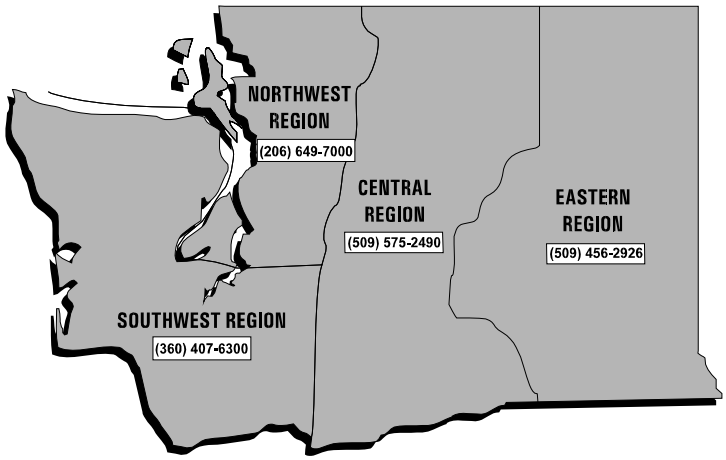
Several publications are available which discuss environmental property assessments, contaminated site reporting, and cleanup. To request a copy of these, contact the Department of Ecology's Publications Office at (206) 407-7472.

- ☑ Property Purchases and Liability for Contamination # F-TC-92-114
- ☑ Hazardous Waste Considerations in Real Estate Transactions # R-TC-92-115
- ☑ Reporting Releases of Hazardous Substances # R-TC-94-133
- ☑ Hazardous Waste Cleanups: Selecting an Environmental Consulting Firm # R-TC-92-116
- ☑ Site Discovery and Release Reporting # TCP Policy 101

## Questions or More Information

For further information or assistance, or to report spills in Washington State, contact the nearest Ecology regional office.

For information about contaminated site reporting, assessment, or cleanup, contact the nearest Ecology Regional Office.

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If you have special accommodation needs, contact Dave Dubreuil at (360) 407-6721 (Voice) or (360) 407-6006 (TDD).

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